



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**ALLIED METAL COMPANY FACILITY
CHICAGO, ILLINOIS
ILD 005 096 532**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
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EXECUTIVE SUMMARY

Dynamac Corporation (Dynamac) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Allied Metal Company (AMC) facility (formerly known as the Harco Aluminum Company (HAC) facility) in Chicago, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

AMC began conducting secondary aluminum smelting at the facility in 1983. As a byproduct of its secondary aluminum smelting process, AMC generates metal dross, which it sells to other companies for use in secondary smelting operations. Operations at the facility include sorting, melting, alloying, and casting of aluminum. AMC does not and has not generated a hazardous waste stream at this facility. AMC currently generates nonhazardous waste oil and baghouse dust.

AMC employs approximately 45 people at this facility. The facility consists of one main building, a baghouse, and a paved parking/storage area.

Prior to 1983, HAC owned and operated the facility. HAC also conducted secondary aluminum smelting, in the same manner as AMC. During its years in operation, HAC generated baghouse dust containing cadmium (D006), as well as nonhazardous waste oil. HAC filed for bankruptcy in 1983. In 1984, AMC purchased the facility from the bankruptcy court. There was no information available during the VSI interview, nor in EPA, Illinois Environmental Protection Agency (IEPA), or facility files at the time of the PA/VSI regarding the date HAC began operations at this location, or the status of the facility prior to HAC's purchase of the facility.

A copy of HAC's Notification of Hazardous Waste Activity (Notification) was not available during the VSI, nor in EPA, IEPA, or facility files at the time of the PA/VSI. HAC submitted a Part A permit application (Part A) as a generator and hazardous waste storage facility to EPA on November 18, 1980. When HAC left the facility in 1983, it abandoned three 2-cubic yard totes of baghouse dust containing cadmium (D006) at the facility.

AMC did not submit a subsequent Notification when it purchased the facility in 1984. AMC did submit a closure plan to IEPA on September 26, 1986, following an IEPA RCRA compliance inspection which resulted in numerous violations for AMC. Several of the violations were based on the fact that AMC was improperly managing hazardous waste, HAC's baghouse dust containing cadmium (D006), at the facility. In a letter included with the closure plan, AMC stated it had been unaware that HAC submitted the Part A or that

the facility was being regulated as an interim status storage facility under RCRA. AMC initiated closure activities in 1988. In a September 7, 1988, letter regarding an August 1988 closure inspection from IEPA to AMC, IEPA stated AMC had conducted closure activities in accordance with the facility's approved closure plan and was still being regulated as a generator of hazardous waste. However, a September 21, 1988, internal IEPA conversation record indicates there was a mistake in the letter; AMC was not generating hazardous waste. According to facility representatives, the facility is not regulated under RCRA.

The PA/VSI identified the following two SWMUs and two AOCs at the facility:

Solid Waste Management Units

1. Dust Collection Area
2. Waste Oil Collection Area

Areas of Concern

1. Underground Storage Tank (UST) Area No. 1
2. UST Area No. 2

The potential for a release to on-site soil, ground water, surface water, or air from facility SWMUs is low. SWMU 1 is located outdoors and manages nonhazardous waste in an enclosed baghouse situated on a concrete surface with no drains. The baghouse is surrounded by a corrugated steel wall on three sides. SWMU 2 is located indoors and manages nonhazardous waste in closed 55-gallon steel drums on a concrete-floored area with no drains. There is no history of documented releases from SWMUs at the facility.

There is a high potential for a release to on-site soil from AOCs 1 and 2. AOC 1 includes a 25,000-gallon steel UST used to store diesel fuel at the facility. AOC 2 includes a 30,000-gallon steel UST that formerly stored fuel, but which has been empty and inactive since about 1984. There was no information available during the VSI, nor in EPA, IEPA, or facility files at the time of the PA/VSI regarding the type of fuel stored in the 30,000-gallon UST. Both USTs were installed by HAC prior to 1984. According to facility representatives at the time of the VSI, AMC removed and disposed of the contents of the UST at AOC 2 shortly after it purchased the facility in 1984, but has continued to use the UST at AOC 1 to store diesel fuel. AMC did not conduct a leak test or sample the soil at AOC 2 when it emptied the 30,000-gallon UST. AMC does not conduct any monitoring of the contents in the UST at AOC 1, nor has it conducted a leak test of the UST. There is a high potential that diesel fuel from the UST at AOC 1 has impacted the surrounding soil. Likewise, there is a high potential that in the past, the fuel contents from the UST at AOC 2 have impacted the surrounding soil.

Since there is a high potential for a release to on-site soil from AOCs 1 and 2, and because the depth to ground water is about 10 feet, there is a moderate potential for a release to ground water from AOCs 1 and 2.

There is a low potential for a release to surface water and air from AOCs 1 and 2. Although the direction of ground water flow in the shallow aquifer is east to southeast, the nearest surface water body is located approximately 1.5 miles southeast of the facility. Any potential contaminants from either UST at AOCs 1 and 2 are located beneath the ground, thus limiting the potential for contaminants to become airborne.

Ground water in the area of the facility is not used as a drinking water source. According to Robert Sulski of IEPA, the City of Chicago obtains its drinking water from Lake Michigan, which is located approximately 6 miles east of the facility. There are no known active industrial or drinking water wells located in the vicinity of the facility.

Surface water runoff from the facility is toward storm sewers that discharge to the Metropolitan Water Reclamation District of Greater Chicago. The nearest surface water bodies consist of two excavated ponds located about 1.5 miles southeast of the facility in Garfield Park. These ponds are each about 10 acres in size. These ponds are not used for drinking water, industrial, or recreational purposes. The other surface water bodies in the within two miles of the facility consist of a series of excavated ponds, forested ponds with emergent vegetation, and artificially flooded ponds; there are a total of about nine ponds. These ponds vary in size from about 3 to 10 acres each, and are located about 1.75 miles east of the facility in Humboldt Park. These ponds are not used for drinking water, industrial, or recreational purposes.

The nearest sensitive environments consist of the two 10-acre excavated ponds in Garfield Park and the series of ponds in Humboldt Park.

Access to the facility is controlled by a 6-foot high chain-link fence. The nearest residences are located approximately 0.2 mile south of the facility. The nearest school, Orr High School, is located approximately 0.25 mile southeast of the facility. There are about 16 other schools located within 2 miles of the facility.

Dynamac recommends no further action for the SWMUs at the AMC facility at this time. Dynamac recommends the facility conduct a leak test or collect soil samples at AOC 1, and collect soil samples in the area of AOC 2 to verify that potential contaminants from either UST have not impacted the surrounding soils.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in EPA Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Allied Metal Company (AMC), facility (formerly known as the Harco Aluminum Company (HAC) facility) in Chicago, Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, containers, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents in files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of the PA/VSI of the AMC facility (EPA ID No. ILD 005 096 532) located in Chicago, Cook County, Illinois. The PA was completed on September 3, 1992. Dynamac gathered and reviewed information from files at the Illinois Environmental Protection Agency (IEPA) Springfield, Illinois, office and from EPA Region 5 RCRA files. In addition, Dynamac gathered information from the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of the Interior (USDI), and the U.S. Geological Survey (USGS).

Deborah Hall and Valerie Farrell of Dynamac conducted the VSI on October 20, 1992. The VSI included an interview with a facility representative and environmental consultant, and a walk-through inspection of the facility. Dynamac identified two SWMUs and two AOCs at the facility. Dynamac completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized along with three inspection photographs in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The AMC facility is located at 4528 West Division Street in Chicago, Cook County, Illinois (latitude 41° 54' 07" N and longitude 87° 44' 08" W) (USGS, 1963), as shown in Figure 1. The facility occupies approximately 5 acres in a predominantly industrial area.

The facility is bordered on the south by Division Street, on the west by a vacant lot followed by a Chicago and North Western (C & NW) rail line, on the north and northeast by a C & NW rail spur, and on the southeast by a vacant building.

2.2 FACILITY OPERATIONS

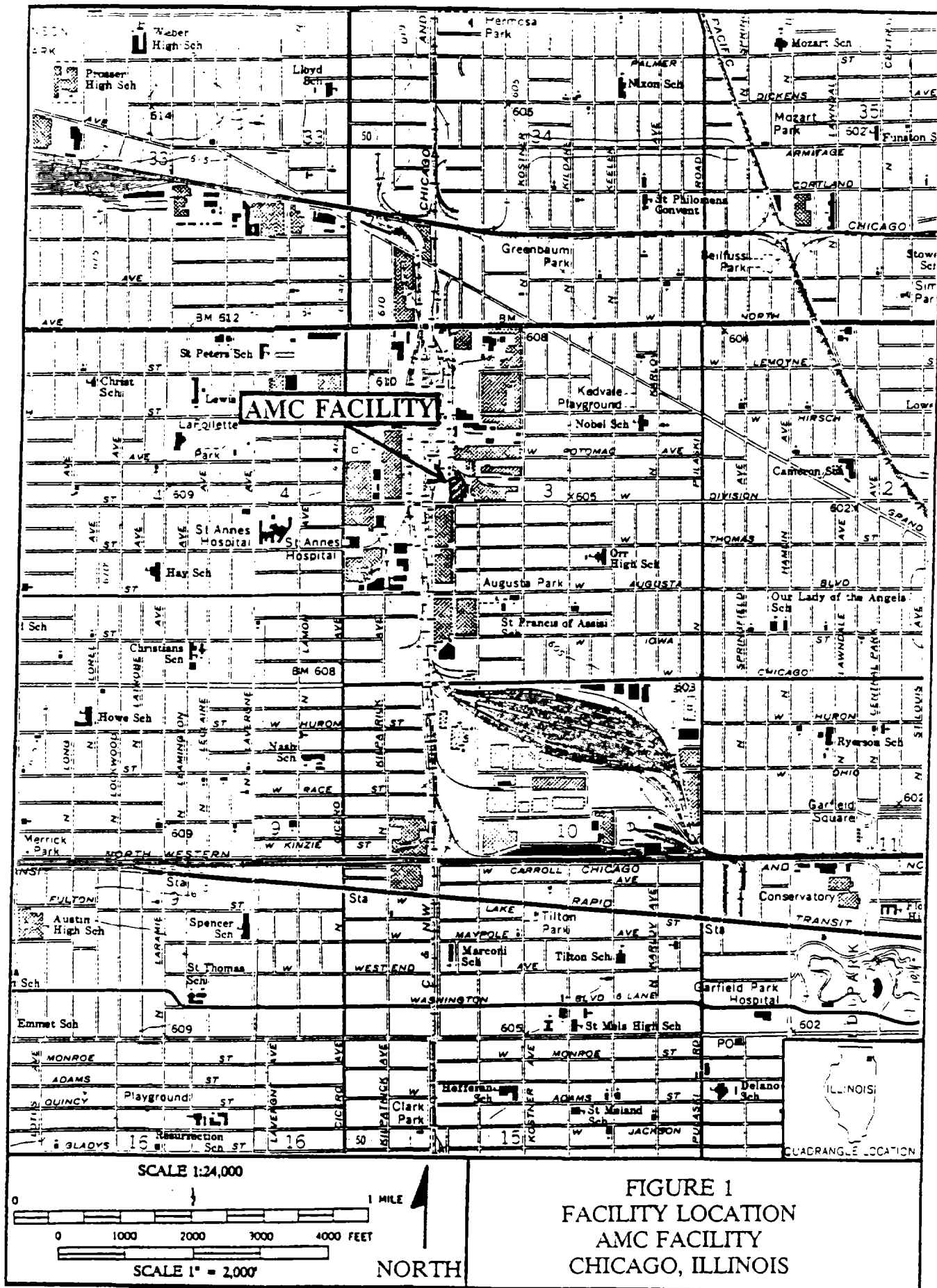
AMC began conducting secondary aluminum smelting at the facility in 1983. As a byproduct of its secondary aluminum smelting process, AMC generates metal dross, which it sells to other companies for use in secondary smelting operations. Operations at the facility include sorting, melting, alloying, and casting of aluminum. AMC uses a variety of raw materials including scrap aluminum; aluminum fluoride; various alloys, such as silicon and copper; and open hearth potassium chloride/sodium chloride flux (flux) during smelting operations. AMC stores the scrap aluminum at numerous locations throughout the facility on either asphalt or concrete surfaces. AMC stores aluminum fluoride in bags situated on wood pallets located on a concrete floor, and the flux and various alloys in boxes, which are also situated on wood pallets located on a concrete floor.

AMC employs approximately 45 people at this facility. The facility consists of one main building, a baghouse, and a paved parking/storage area. Access to the facility is controlled by a six-foot high chain-link fence.

Prior to 1983, HAC owned and operated the facility. HAC also conducted secondary aluminum smelting, in the same manner and with most of the same raw materials as AMC. HAC filed for bankruptcy in 1983. In 1984, AMC purchased the facility from the bankruptcy court. There was no information available during the VSI interview, nor in EPA, IEPA, or facility files at the time of the PA/VSI regarding when HAC began operations at this location, or the use of the facility prior to HAC's purchase of the facility.

There are two underground storage tanks (UST) at the facility: one 25,000-gallon steel UST currently used to store diesel fuel, and one 30,000-gallon steel UST previously used to store an undocumented type of fuel. The 30,000-gallon UST has been empty and inactive since about 1984.

Solid waste generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.



Source: modified from USGS, 1963

2.3 WASTE GENERATION AND MANAGEMENT

AMC does not and has not generated a hazardous waste stream at this facility. AMC currently generates nonhazardous waste oil and baghouse dust. During its years in operation, HAC generated baghouse dust containing cadmium (D006), as well as nonhazardous waste oil.

Wastes have been generated and managed at two locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs and AOCs in relation to the facility layout are shown in Figure 2. Wastes generated and managed at the at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes is discussed below.

During its years in operation, HAC generated approximately 750 cubic yards annually of baghouse dust containing cadmium (D006) from secondary smelting operations at the facility. HAC collected this waste in the Dust Collection Area (SWMU 1) prior to shipping it off site. HAC sold the waste to various facilities for use as a raw material in their operations. There was no information available during the VSI, nor in EPA, IEPA, or facility files at the time of the PA/VSI regarding the name of the transporter(s) or facilities that purchased this waste.

AMC generates approximately 80 gallons annually of nonhazardous waste oil from machinery maintenance at the facility. The facility collects this waste in one of three 55-gallon steel drums located at the Waste Oil Collection Area (SWMU 2) prior to shipping the waste off site. Illinois Recovery Systems, Inc., transports this waste off site to it facility located in Wheeling, Illinois, for recycling. Prior to 1983, HAC also generated nonhazardous waste oil and collected this waste at the Waste Oil Collection Area (SWMU 2) prior to shipping it off site. There was no information available during the VSI, nor in EPA, IEPA, or facility files regarding HAC's generation rate or method of disposal of this waste, or the name of HAC's transporter and disposal facility for this waste.

AMC also generates approximately 8 cubic yards weekly of nonhazardous baghouse dust from secondary smelting operations at the facility. The facility collects this waste in the Dust Collection Area (SWMU 1). Prior to August of 1985, AMC sold the nonhazardous baghouse dust to several other companies for use as a raw material in their operations; however, facility representatives could not recall the names and locations of the companies at the time of the VSI. Information obtained during the PA indicates M&G Metal Reclaiming located in Schaumburg, Illinois, was one of the companies that purchased this material from AMC (M & G, 1986). There was no information available during the VSI, nor in EPA, IEPA, or facility files concerning the name of the former transporter of this waste, or the names of the other companies to which AMC sold this waste. In August of 1985, AMC began using this waste as a flux in its smelting processes.

2.4 HISTORY OF DOCUMENTED RELEASES

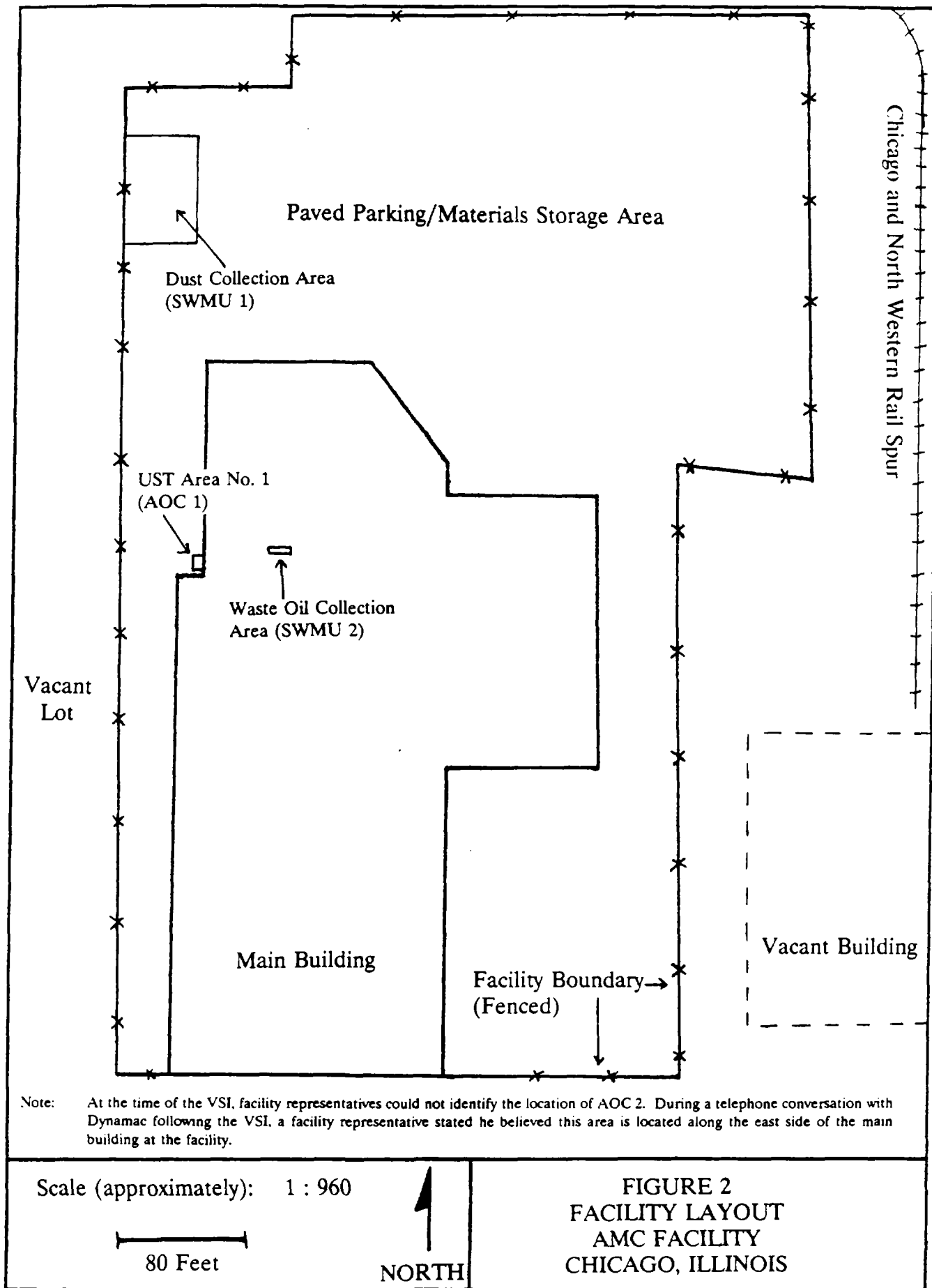
There is no history of documented releases at the facility.

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit ^a	Status
1	Dust Collection Area	Yes	RCRA closed in 1988; active for storage of nonhazardous waste
2	Waste Oil Collection Area	No	Active for storage of nonhazardous waste

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Source: modified from HAC, 1980

TABLE 2
SOLID WASTES

Waste/EPA Waste Code ^a	Source ^b	Solid Waste Management Unit
Baghouse dust containing cadmium/D006	Secondary smelting operations (HAC)	1
Waste oil/NA	Machinery maintenance (AMC/HAC)	2
Nonhazardous baghouse dust/NA	Secondary smelting operations (AMC)	1

Notes:

^a Nonapplicable (NA) designates nonhazardous waste.

^b Following the source of each waste is the name of the facility that generated the waste.

2.5 REGULATORY HISTORY

There was no information available during the VSI, nor in EPA, IEPA, or facility files at the time of the PA/VSI regarding whether or not HAC submitted a Notification of Hazardous Waste Activity to the EPA. HAC submitted a Part A permit application to EPA on November 18, 1980. The Part A did not list any process codes or capacities; however, HAC described the waste at the facility as baghouse dust which was collected in a baghouse. The baghouse reference in the Part A refers to the Dust Collection Area (SWMU 1). The Part A did not list the estimated annual quantity of baghouse dust, but did indicate the waste was suspected to contain cadmium. At the time the facility submitted the Part A, HAC was waiting for the analytical results of the waste to determine if the waste was, in fact, characteristic for cadmium (HAC, 1980). EP Toxicity test results of this waste indicated it contained levels of up to 2.6 ppm of leachable cadmium, thus characterizing the waste as a hazardous waste (KES, 1980).

In 1986, IEPA conducted a RCRA compliance inspection at the facility and discovered that HAC had abandoned three 2-cubic-yard totes of baghouse dust containing cadmium (D006) at the facility. Following the inspection, IEPA required AMC to submit a closure plan for the Dust Collection Area (SWMU 1), and requested the facility come into compliance with the interim status storage facility requirements or follow up with closure activities of the RCRA interim status unit (IEPA, 1986). AMC submitted a closure plan to IEPA on September 26, 1986. In a letter included with the closure plan, AMC stated it had been unaware that HAC submitted the Part A or that the facility was being regulated as an interim status storage facility under RCRA (AMC, 1986). AMC initiated closure activities in 1988. In a September 7, 1988, letter regarding an August inspection from IEPA to AMC, IEPA stated AMC had conducted closure activities in accordance with the facility's approved closure plan and was still being regulated as a generator of hazardous waste (IEPA, 1988a). However, a September 21, 1988, internal IEPA conversation record indicates there was a mistake in the letter; AMC was not generating hazardous waste (IEPA, 1988b). According to facility representatives, the facility is not regulated under RCRA.

The facility has had RCRA compliance problems. During the 1986 IEPA inspection at the facility, IEPA cited the facility for deficiencies in paperwork including the inspection log, waste analysis plan, personnel training records, contingency plan, operating record, and closure plan. IEPA also cited the facility storing hazardous waste in open containers and failing to use hazardous waste manifests for shipping the waste. Dynamac notes the hazardous waste referred to in the 1986 IEPA inspection was not generated by AMC, but was the baghouse dust containing cadmium (D006) that HAC abandoned at the facility in 1983. The IEPA inspector was informed that AMC claimed to be unaware its facility was regulated as an interim status storage facility, and noted that if the facility certified it was a non-handler of hazardous waste, all violations except for those pertaining to hazardous waste management procedures would be considered resolved. The facility responded by submitting a closure plan to EPA and conducting closure of the Dust Collection Area (SWMU 1), as described previously.

The facility has an operating air permit (No. 72090198) which covers emission sources in the entire facility (IEPA, 1985). There was no information available in EPA, IEPA, or facility files regarding any air quality inspections and/or violations at the facility. There is no history of odor complaints regarding the facility.

The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. There has not been any CERCLA (Superfund) activity at the facility.

There are two USTs at the facility: one 25,000-gallon steel UST currently used to store diesel fuel, and one 30,000-gallon steel UST previously used to store an undocumented type of fuel. The 30,000-gallon UST has been empty and inactive since about 1984 (See Section 4.0, Areas of Concern, for details regarding both USTs at the facility).

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the AMC facility.

2.6.1 Climate

The facility is located approximately 9 miles southeast of O'Hare International Airport, the nearest National Weather Service station. The climate in this area is continental with cold winters and warm summers. Lake Michigan, located approximately 6 miles east of the facility, has a moderating influence on temperature extremes. The average annual daily temperature is 49.2° fahrenheit (F). The highest average daily temperature is 73.0° F in July, and the lowest average daily temperature is 21.4° F in January (NOAA, 1990).

Mean annual precipitation is 33.34 inches (NOAA, 1990). Mean annual lake evaporation is approximately 30 inches and net annual precipitation is approximately 3 inches. The one-year 24-hour maximum rainfall is approximately 2.4 inches (NOAA, 1979).

The prevailing wind is from the west-southwest. Average wind speed is highest in April at an average of 12 miles per hour from the west-southwest (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The facility is located in an area of minimal flooding, outside the 100-year or 500-year flood plain of any surface water body (FEMA, 1981). The nearest surface water bodies consist of two excavated ponds located about 1.5 miles southeast of the facility in Garfield Park. These ponds are each about 10 acres in size and are not used for drinking, industrial, or recreational purposes. The other surface water bodies within two miles of the facility consist of a series of excavated ponds, forested ponds with emergent vegetation, and artificially flooded ponds; there are a total of about nine ponds. These ponds vary in size

from about 3 to 10 acres, and are located about 1.75 miles east of the facility in Humboldt Park (USDI, undated). These ponds are not used for drinking, industrial, or recreational purposes.

2.6.3 Geology and Soils

There has been no Soil Conservation Service mapping of the soils in the vicinity of the AMC facility. The surficial geological deposits are mapped as Wadsworth Till Member of the Wedron Formation deposited during the latest Wisconsin-age glaciation. The Wadsworth Till is a clayey or silty clayey till with few pebbles and cobbles and occasional sand and gravel lenses (Lineback, 1979). Thin silty clay lacustrine deposits of the Carmi Member of the Equality Formation may overlie the till in some areas (Willman, 1971). The total thickness of the unconsolidated surficial deposits is approximately 60 feet (Hughes, Kraatz, and Landon, 1966).

The uppermost bedrock in the vicinity of the facility is dolomite of the Silurian-age Niagran and Alexandrian Series. The upper Niagran Series is characterized by massive reef complexes and nearly pure dolomite, with some argillaceous zones between the reefs. The lower Alexandrian Series is composed of well bedded cherty and argillaceous dolomite in a variety of colors (Willman, 1971). The total thickness of the Silurian dolomites in this area is approximately 350 feet (Hughes, Kraatz, and Landon, 1966).

Underlying the dolomite is the Ordovician-age Maquoketa Shale. The Maquoketa Shale is red and oolitic near the top, and gray green, with some interbedded shaley limestone, at depth. The Maquoketa Shale is underlain by several thousand feet of Ordovician-age and Cambrian-age dolomites and sandstones (Willman, 1971).

2.6.4 Ground Water

Ground water in the area of the facility is not used for industrial or drinking water purposes. There are no wells at the facility and there are no known operating wells within three miles of the facility; therefore regional ground water information is limited (Dynamac, 1992). Dynamac could not locate any information concerning possible drift aquifers underlying the Wadsworth Till. The Silurian dolomites comprise a shallow bedrock aquifer. The shallow bedrock aquifer is a leaky artesian aquifer in much of the area because the overlying clayey till is a confining layer. Regional ground-water flow in this aquifer is east and southeast and measured hydraulic activities average 1×10^{-4} centimeters per second. A deep bedrock aquifer is comprised of the dolomites and sandstones underlying the Maquoketa Shale. The Maquoketa Shale serves as a confining layer of the deep bedrock aquifer (Hughes, Kraatz, and Landon, 1966). Ground-water flow in this aquifer is generally towards the east (Schict, Adams, and Stall, 1976). Depth to ground water in the vicinity of the facility is not documented, but is likely to be about 10 feet below ground surface, corresponding to the elevations of the ponds at Garfield and Humboldt Parks. These ponds are located about 1.5 miles southeast and 1.75 miles east, respectively.

Private and municipal drinking water supplies in the area of the facility are derived from surface water intakes on Lake Michigan, which is located approximately 6 miles east of the facility (Dynamac, 1992).

2.7 RECEPTORS

The AMC facility occupies a total of about 5 acres of land in a predominantly industrial area in Chicago, Illinois, which had a 1990 population of about 2,783,726 persons (State of Illinois, 1991).

The facility is bordered on the south by Division Street, on the west by a vacant lot followed by a C & NW rail line, on the north and northeast by a C & NW rail spur, and on the southeast by a vacant building. The nearest residences are located approximately 0.2 miles south of the facility. The nearest school, Orr High School, is located approximately 0.25 miles southeast of the facility. There are about 16 other schools located within 2 miles of the facility (USGS, 1963). Access to the facility is controlled by an 6-foot high chain-link fence.

Surface water runoff from the facility is collected by storm sewers that discharge to the Metropolitan Water Reclamation District of Greater Chicago. The nearest surface water bodies consist of two excavated ponds located about 1.5 miles southeast of the facility in Garfield Park. These ponds are each about 10 acres in size. These ponds are not used for drinking, industrial, or recreational purposes.

Ground water in the area of the facility is not used as a drinking water source. According to Robert Sulski of IEPA, the City of Chicago obtains its drinking water from Lake Michigan, which is located approximately 6 miles east of the facility. There are no active industrial or drinking water wells located in the City of Chicago (Dynamac, 1992).

The nearest sensitive environments consist of the two 10-acre excavated ponds in Garfield Park and the series of ponds in Humboldt Park (USDI, undated).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU; description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

SWMU 1

Dust Collection Area

Unit Description:	The Dust Collection Area consists of a 2,350-square-foot concrete-floored area surrounded by corrugated tin walls on three sides. The unit is located outdoors in the northeast corner of the facility and contains an enclosed baghouse used to collect nonhazardous baghouse dust generated during secondary smelting operations at the facility. The unit also formerly contained several steel totes, approximately 2 cubic yards each in size, used to manage baghouse dust. The facility conducted IEPA-approved RCRA closure of this unit in 1988. There are no storm drains in the area of this unit.
Date of Startup:	This unit began operation at an unknown date prior to 1980.
Date of Closure:	This unit underwent IEPA-approved RCRA closure in 1988; this unit is currently active for collection of nonhazardous waste.
Wastes Managed:	This unit currently manages nonhazardous baghouse dust, which AMC currently uses as a raw material (flux) in its own processes. From 1984 until August of 1985, AMC sold the nonhazardous baghouse dust to various facilities for use as a raw material in their processes. Prior to 1984, HAC used the unit to manage baghouse dust containing cadmium (D006). HAC sold this waste to various facilities for use as a raw material in their processes.
Release Controls:	This unit manages nonhazardous waste in an enclosed baghouse located on a concrete-floored area with no drains.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	Dynamac observed the 2,350-square-foot unit, which appeared to be operational at the time of the VSI (See Photo No. 1). Rain water had collected on the ground in the area of this unit, due to intermittent rain throughout the inspection. There were no visible stains or cracks on the concrete floor, and there was no evidence of a release in the area of this unit.

SWMU 2**Waste Oil Collection Area**

Unit Description: The Waste Oil Collection Area consists of an approximate 24-square-foot area located on a concrete floor inside the main building at the facility. The unit manages nonhazardous waste in closed 55-gallon steel drums. There are no floor drains in the area of this unit.

Date of Startup: This unit began operation at an unknown date prior to 1980.

Date of Closure: This unit is active.

Wastes managed: This unit manages nonhazardous waste oil, which is shipped off site for recycling.

Release Controls: This unit manages nonhazardous waste in closed 55-gallon steel drums on a concrete floor with no drains. There are no other release controls associated with this unit.

History of Documented Releases: No releases from this unit have been documented.

Observations: Dynamac observed the unit, which contained three 55-gallon steel drums of nonhazardous waste oil (See Photo No. 2). The drums were labeled "used oil", and two of them were dated May 19, 1992. The concrete floor in the area of the unit was stained with an oily substance. There were no visible cracks in the concrete floor of this unit.

4.0 AREAS OF CONCERN

Dynamac identified two AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

AOC 1 UST Area No. 1

UST Area No. 1 is located along the west side of the main building at the facility (See Photo No. 3). This AOC contains a 25,000-gallon steel UST that is currently used to store diesel fuel. According to facility representatives, this UST was installed by HAC prior to 1984. There was no documentation available in EPA, IEPA, or facility files at the time of the PA/VSI indicating the year in which HAC installed the UST. Because AMC does not conduct any monitoring of the contents of the UST and has not conducted a leak test of the UST, this area is considered to be an AOC.

AOC 2 UST Area No. 2

UST Area No. 2 contains a 30,000-gallon steel UST that formerly stored fuel, but has been empty and inactive since about 1984. According to facility representatives, the UST was installed by HAC prior to 1984; AMC removed and disposed of the contents of the UST shortly after it purchased the facility. There was no information available during the VSI, nor in EPA, IEPA, or facility files at the time of the PA/VSI indicating what type of fuel was stored in the UST or how AMC disposed of the contents of the UST. Facility representatives could not recall the location of this UST at the time of the VSI, therefore a photograph of this area is not available. During a telephone conversation with Dynamac following the VSI, a facility representative stated he believed the UST was located along the east side of the main building at the facility. When AMC emptied the contents of the UST, it did not conduct a leak test of the UST or sample the soil in the area surrounding the UST. For this reason, this area is considered to be an AOC.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and two AOCs at the AMC facility. Background information on the facility's location, operations, waste generation and management, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are Dynamac's conclusions and recommendations for each SWMU and AOC. Table 3, located at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 Dust Collection Area

Conclusions: The Dust Collection Area is a concrete-floored area with no drains that is surrounded by corrugated tin walls on three sides. The unit is located outdoors in the northeast corner of the facility and contains an enclosed baghouse used to collect nonhazardous baghouse dust. Prior to 1984, the unit also contained several 2-cubic-yard steel totes used to manage both nonhazardous baghouse dust and baghouse dust containing cadmium (D006). The facility conducted IEPA-approved RCRA closure of this unit in 1988. No releases from this unit have been documented. At the time of the VSI, there were no visible stains or cracks on the concrete floor, and there was no evidence of a release in the area of this unit. The potential for a release to any environmental media from this unit is low.

Recommendations: Dynamac recommends no further action for the unit at this time.

SWMU 2 Waste Oil Collection Area

Conclusions: The Waste Oil Collection Area consists of a concrete-floored area with no drains located inside the main building at the facility. This unit began operation at an unknown date prior to 1980 and manages nonhazardous waste oil in closed 55-gallon steel drums. There are no floor drains in the area of this unit. No releases from this unit have been documented. At the time of the VSI, the concrete floor in the immediate area of the unit was stained with an oily substance. There were no visible cracks in the concrete floor of this unit. The potential for a release to any environmental media from this unit is low.

Recommendations: Dynamac recommends no further action for the unit at this time.

AOC 1

UST Area No. 1

Conclusions:

UST Area No. 1 is located along the west side of the main building at the facility and contains a 25,000-gallon steel UST that is currently used to store diesel fuel. According to facility representatives, this UST had been installed by HAC prior to 1984. There was no documentation available in EPA, IEPA, or facility files at the time of the PA/VSI indicating the year in which HAC installed the UST. AMC does not conduct any monitoring of the contents of the UST, and has not conducted a leak test of the UST. The potential for a release to environmental media from this UST are summarized below.

On-Site Soil: High. This UST was installed at the facility by HAC prior to 1984. AMC does not conduct any monitoring of the contents of the UST, and has never conducted a leak test of the UST. For these reasons, there is a high potential for a release to on-site soil from this AOC.

Ground Water: Moderate. Since there is a high potential for a release to on-site soil from this AOC, and because the depth to ground water is about 10 feet, there is a moderate potential for a release to ground water from this AOC.

Surface Water: Low. Although the direction of ground-water flow in the shallow aquifer in the area of the facility is east to southeast, the nearest surface water body is located approximately 1.5 miles southeast of the facility. For this reason, there is a low potential for a release to surface water from this AOC.

Air: Low. Because the UST is located underground, there is a low potential for a release to air from this AOC.

Recommendations: Dynamac recommends the facility conduct a leak test of the UST or collect soil samples in the area of the UST to verify that diesel fuel from the UST has not impacted the surrounding soil.

AOC 2

UST Area No. 2

Conclusions:

UST Area No. 2 contains a 30,000-gallon steel UST that formerly stored fuel, but has been empty and inactive since about 1984. There was no information available during the VSI, nor in EPA, IEPA, or facility files at the time of the PA/VSI indicating what type of fuel was stored in the UST. According to facility representatives, the UST was installed by HAC sometime prior to 1984. Facility representatives

could not recall the location of this UST at the time of the VSI, but later stated they believed the UST was located along the east side of the main building at the facility. When AMC emptied the contents of the UST, it did not conduct a leak test of the UST or sample the soil in the area surrounding the UST. No releases from the UST have been documented. The potential for a release to environmental media from this UST is summarized below.

On-Site Soil: High. This UST was installed at the facility by HAC prior to 1984. AMC did not conduct a leak test or any soil sampling when it emptied the UST in 1984. For these reasons, there is a high potential for a release to on-site soil from this AOC.

Ground Water: Moderate. Since there is a high potential for a release to on-site soil from this AOC, and because the depth to ground water is about 10 feet, there is a moderate potential for a release to ground water from this AOC.

Surface Water: Low. Although the direction of ground-water flow in the shallow aquifer in the area of the facility is east to southeast, the nearest surface water body is located approximately 1.5 miles southeast of the facility. For this reason, there is a low potential for a release to surface water from this AOC.

Air: Low. Because the UST is located underground, there is a low potential for a release to air from this AOC.

Recommendations: Dynamac recommends the facility determine the location of this UST and collect soil samples in the area of the UST to verify that the fuel previously stored in the UST has not impacted the surrounding soil.

TABLE 3
SWMU ANDAOC SUMMARY

<u>Solid Waste Management Unit</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Dust Collection Area	Pre-1980s to the present	None	None
2. Waste Oil Collection Area	Pre-1980s to the present	None	None
<u>Area of Concern</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. UST Area No. 1	Prior to 1984 to the present	None	Conduct leak test or soil sampling in the area of the UST
2. UST Area No. 2	Prior to 1984	None	Determine the location of the UST and conduct soil sampling in the area of the UST

ENFORCEMENT
CONFIDENTIAL

REFERENCES

- Allied Metal Company (AMC), 1986. Closure Plan for the RCRA interim status storage area at the AMC facility, September 29.
- Dynamac Corporation (Dynamac), 1992. Telephone conversation between Robert Sulski, Illinois Protection Agency (IEPA), and Deborah Hall, Dynamac, regarding surface water use in the Chicago area, March 30.
- Federal Emergency Management Agency (FEMA), 1981. Flood Insurance Rate Map of Cook County, Illinois, Panel 115 of 245, April 15.
- Harco Aluminum Company (HAC), 1980. Part A permit application, November 18.
- Hughes, G., P. Kraatz, and R. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois," Illinois State Geological Survey, Circular No. 406.
- IEPA, 1985. Operating Air Permit (No. 72090198) for all emission sources at the AMC facility issued by IEPA, April 22.
- IEPA, 1986. Memorandum from John Maher, IEPA, to Gary King, IEPA, regarding the results of a January 22, 1986, RCRA compliance inspection at the AMC facility, May 9.
- IEPA, 1988a. Letter from Lawrence Eastep, IEPA, to Robert Alexander, AMC, regarding facility compliance during an August 11, 1988, closure inspection at the AMC facility, September 7.
- IEPA, 1988b. Internal Conversation Record written by Mary Villarred, IEPA, regarding conversation with Eugene Dingledine, IEPA, about the RCRA status of the AMC facility, September 21.
- Kemron Environmental Services (KES), 1980. Analytical results of an October 23, 1980 sample of baghouse dust from the HAC facility, December 23.
- Lineback, J.A., 1979. Quaternary Deposits in Illinois, Map, 1:500,000 scale.
- M & G Metal Reclaiming (M & G), 1986. Letter from Mike Stringini, M & G, to AMC, regarding purchase of baghouse for chemical use, September 4.
- National Oceanic and Atmospheric Administration (NOAA), 1979. Climatic Atlas of the U.S., Asheville, North Carolina.
- NOAA, 1990. Local Climatological Data for O'Hare International Airport, Illinois.

REFERENCES (continued)

- Schiet, R., J. Adams, and J. Stall, 1976. Water Resources Availability, Quality, and Cost in Northeastern Illinois, Illinois Geological Survey Report of Investigation No. 83.
- State of Illinois, 1991. Official Highway Map of Illinois.
- U.S. Department of the Interior (USDI), undated. National Wetlands Inventory Map, 1:24,000 scale, Chicago Loop, Illinois, Quadrangle, based on 1984 aerial photography.
- U.S. Environmental Protection Agency (EPA), 1981. Internal Memorandum from Liz Utley, EPA, to the HAC file, regarding the RCRA status of the HAC facility.
- U.S. Geological Survey (USGS), 1963. 7.5 Minute Series Topographic Map, Chicago Loop and River Forest, Illinois, Quadrangles, 1:24,000, photorevised in 1972 and 1978.
- Willman, H. B., 1971. "Summary of the Geology of the Chicago Area," Illinois State Geological Survey, Circular No. 460.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 005 096 532
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II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)

Allied Metal Company (formerly known as Harco Aluminum Company)

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER

4528 West Division Street

03 CITY

Chicago

04 STATE

IL

05 ZIP CODE

60651

06 COUNTY

Cook

07 COUNTY CODE

08 CONG DIST

09 COORDINATES: LATITUDE

41° 54' 07" N

LONGITUDE

87° 44' 08" W

10 DIRECTIONS TO SITE (Starting from nearest public road)

The facility is on the north side of the road, about 0.25 mile east of Cicero Avenue on West Division Street.

III. RESPONSIBLE PARTIES

01 OWNER (if known)

Allied Metal Company

02 STREET (Business, mailing residential)

(same as above)

03 CITY

04 STATE

05 ZIP CODE

06 TELEPHONE NUMBER

(312) 225-2800

07 OPERATOR (if known and different from owner)

(same as owner)

08 STREET (Business, mailing, residential)

09 CITY

10 STATE

11 ZIP CODE

12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE☐ B. FEDERAL:

(Agency name)

☐ C. STATE☐ D. COUNTY☐ E. MUNICIPAL☐ F. OTHER

(Specify)

☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3010 DATE RECEIVED:MONTH DAY YEAR
Not Documented☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c)

DATE RECEIVED:

MONTH DAY YEAR

☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

☒ YES

DATE 10 / 20 / 92

☐ NO☐ A. EPA☐ B. EPA CONTRACTOR☐ C. STATE☐ D. OTHER CONTRACTOR☐ E. LOCAL HEALTH OFFICIAL☐ F. OTHER:

(Specify)

CONTRACTOR NAME(S): Dynamac Corporation

02 SITE STATUS (Check one)

☒ A. ACTIVE☐ B. INACTIVE☐ C. UNKNOWN

03 YEARS OF OPERATION

Pre-1980 / Present

☐ UNKNOWN

BEGINNING YEAR ENDING YEAR

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Raw materials currently at the facility include aluminum fluoride, open hearth potassium chloride/sodium chloride flux, and diesel fuel.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

There is a potential that diesel fuel from an active underground storage tank (UST) has leaked to the soil and ground water at the facility. There is also a potential that an undocumented type of fuel from an inactive UST (empty since 1984) has leaked to the soil and ground water at the facility.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH

(Inspection required promptly)

☐ B. MEDIUM

(Inspection required)

☐ C. LOW

(Inspection on time-available basis)

☐ D. NONE

(No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

Kevin Pierard

02 OF (Agency/Organization)

U.S. EPA

03 TELEPHONE NUMBER

(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT

Deborah Hall

05 AGENCY

06 ORGANIZATION

Dynamac Corporation

07 TELEPHONE NUMBER

(312) 468-0222

08 DATE

10 / 20 / 92

ATTACHMENT B
VISUAL SITE INSPECTION
SUMMARY AND
PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Allied Metal Company Facility
4528 West Division Street
Chicago, Illinois 60616
ILD 005 096 532

Date: October 20, 1992

Primary Facility Representative: Hal Jernigan, Vice President of Manufacturing;
Allied Metal Company (AMC)

Representative Telephone No.: (312) 225-2800

Additional Facility Representative: Philip J. Molè, Professional Engineer;
Sun-Eco-Systems

Inspection Team: Deborah Hall, Dynamac Corporation
Valerie Farrell, Dynamac Corporation

Photographer: Deborah Hall, Dynamac Corporation

Weather Conditions: Cloudy; about 55° F

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Mr. Jernigan provided the inspection team with copies of requested documents.

The VSI tour of the facility began at 10:00 a.m. The inspection team walked along the west side of the main building at the facility where Dynamac observed the Underground Storage Tank (UST) Area No. 1 (AOC 1). The inspection team then walked to the northwest corner of the facility to the Dust Collection Area (SWMU 1). The tour continued inside the main building at the facility, where Dynamac observed the Waste Oil Collection Area (SWMU 2).

Visual Site Inspection Summary
AMC Facility
October 20, 1992

The tour of the facility concluded at approximately 10:25 a.m., after which the inspection team held an exit interview with Mr. Molé, the facility's environmental consultant, and left the facility.

PHOTOGRAPHS
ALLIED METAL COMPANY FACILITY
CHICAGO, ILLINOIS



Photo No.: 1
 Orientation: West
 Description: The Dust Collection Area located in the northwest corner of the facility. Harco Aluminum Company, the former facility owner and operator, abandoned three approximately 2-cubic-yard totes containing baghouse dust containing cadmium (D006) at this location.

Location: SWMU 1
 Date: October 20, 1992



Photo No.: 2
 Orientation: North
 Description: Three 55-gallon drums containing nonhazardous waste oil located at the Waste Oil Collection Area in the main building at the facility. Note the spilled waste oil of the floor in the immediate area of the center drum.

Location: SWMU 2
 Date: October 20, 1992

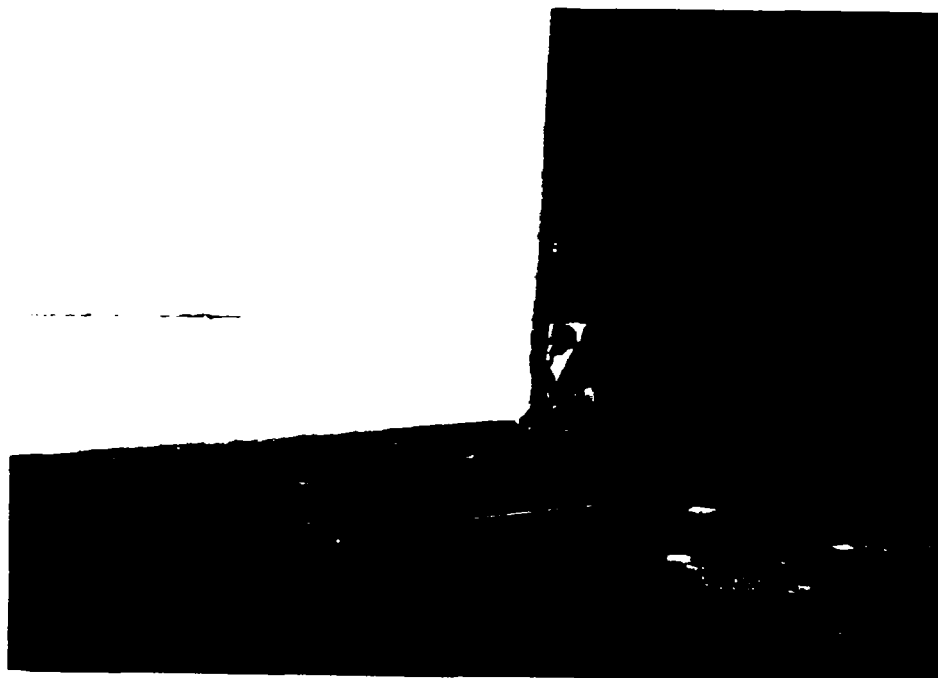


Photo No.: 3
Orientation: Southeast
Description: This area, Underground Storage Tank (UST) Area No. 1, contains a 1,000-gallon diesel fuel UST. It is located along the west side of the main building at the facility.

Location: AOC 1
Date: October 20, 1992

END OF PHOTOGRAPHS

ATTACHMENT C

**VISUAL SITE INSPECTION
FIELD NOTES**

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10-20-92

ALLIED METAL CO.

US28 DIVISION

Arrive at site @ ~ 9:00 am.

Met w/ Mr. P.J. Mole
and Hal Jernigan - V.P.
Manufacturing

Environmental Consultants
for Allied.

Acres = 4.3 ±.

Building = 132,000 sq-ft. ^{one} main bldg

Employees: ~45

- Allied purchased Harco in
May 1984.

- Same type of business, Allied
has changed and updated
processes and pollution
control equipment.

ALLIED (CONT'D)

10-20-92

- PCB's -

- no power equipment or transformers
- Allied has not had any PCB's in past.

- No Asbestos

- No major operational changes

- Conduct analysis of bag house every six months - still contains some cadmium.

- raw materials

- aluminum fluoride
- sodium chloride (pot ash)

- Waste Oil -

- machinery maintenance
- burns some in boring dryer operations
- remainder is picked up by Beaver Oil Co.
- Illinois Recovery Systems in Wheeling, IL.
- 500 gallons 10-24-80

10-20-92

- No Die Casting at facility
- Combined storm/sanitary sewer to MWRDGC.
- No waste water generated
 - a closed loop system.
- Air permit: copy requested.
Permit No: 031600AOP
- No CERCLA no Superfund Activity
- Underwent IEPA approved RCRA closure in 1988
- 2 (USTs) ~1,000 gallon - (^{diesel}gasoline)
 - located at N.W. corner of building
 - steel - installed ~unknown
 - no leak testing

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10-20-92

Baghouse Dust:

10:00 a.m. Begin facility walk-through

Photo 1: SE: Location of
diesel UST

Photo 2: WEST: Baghouse
and former location of
totes.

Photo 3: N. Waste oil
accumulation area
3-drum
12' x 2' area
stained.

10:25 a.m. Complete facility
walk-through and held
exit meeting w/ environmental
consultant.

- requested info. regarding transporter
and TSD for Baghouse
- also UST info.
- Will be Faxed A.S.A.P.

